

Exhibit A

To Affirmation of Benjamin F. Neidl



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June 19, 2020

Via Email

T. Edward Williams, Esq.
Williams LLP
7 World Trade Center
250 Greenwich Street, 46th Floor
New York, N.Y. 10007

PLEASE REPLY TO:

Try Office

Re: **9384-2557 Quebec, Inc. et. al. v. Northway Mining LLC et. al.**
N.D.N.Y. 1:19-cv-00501

Dear Mr. Williams:

I am writing pursuant to Magistrate Judge Hummel's instructions from today's telephone conference.

Our client tells us that the Serenity/MinedMap machines are in storage at two locations in Oswego, New York: (i) 2140 County Route 1, Oswego; and (ii) 193 East Seneca Street, Oswego. We have informed Mr. Maranda of Judge Hummel's order that the machines not be moved from those locations.

With regard to your request for disclosure of where "the money" is, your clients paid money to Northway Mining and, Mr. Maranda reports, Northway spent those amounts and then some doing the extensive electrical build out to host your clients' machines and to set up and program the machines.¹ The money your clients paid was not a trust fund or escrow that Northway segregated (or was required to segregate) and Mr. Maranda reports that the defendants are not holding any of those monies now. These were fungible payments.

Judge Hummel also directed us to advise you on our position as to whether we would produce what you referred to as the "IP hash" associated with the machines. After the conference, and after conferring with our client, I asked you to clarify what you meant by "IP hash," since that particular term was unfamiliar to us and to our client. In your email of 3:33 p.m. today, you clarified that you are looking for the "Pool Address/Pool Account." In response to that clarification, Mr. Maranda has provided us with the attached screen shot which he says is responsive to your request. Please advise if this is what you are looking for. (Please note that most of the machines are not actually plugged in and are simply being stored and, therefore, are not in a pool.)

¹ Northway claims a lien on the machines pursuant to N.Y. Lien Law §108, for the work performed to ready the machines for service before the plaintiffs purported to terminate their contracts. As we discussed last week, our position is that we would release the machines to you if Serenity/MinedMap posts an undertaking that complies with CPLR Article 25.

Sincerely,

E. STEWART JONES HACKER MURPHY LLP

A handwritten signature in black ink, appearing to read "Ben F. Neidl", with a long horizontal flourish extending to the right.

Benjamin F. Neidl, Esq.

bneidl@joneshacker.com

Direct Dial: (518) 270-1253

Pool Screen shot

